
EXHIBIT B TO DECLARATION OF VIRGINIA K. DEMARCHI



Debra R. Bernard
PHONE: (312) 324-8559
FAX: (312) 324-9559
EMAIL: DBernard@perkinscoie.com

131 S. Dearborn Street, Suite 1700
Chicago, IL 60603-5559
PHONE: 312.324.8400
FAX: 312.324.9400
www.perkinscoie.com

April 15, 2008

EMAIL

Virginia K. DeMarchi
Fenwick & West LLP
801 California Street
Mountain View, CA 94041

Dear Virginia:

This is in response to your letter dated April 11, 2008 regarding expedited discovery. I have several comments. First, before the parties exchange documents, I suggest that we agree on an appropriate protective order. Please forward a proposed protective order for our review. Second, while in principle, we agree to try and expedite document collection and production, as a practical matter, between travel and other business commitments, I am not sure how much can be accomplished prior to April 28. Some documents requested in Paragraphs 1 and 5 may be in the electronically stored information such as emails which may take longer to process, review and produce. We are proceeding diligently and will produce information as it becomes available.

With respect to the categories you have identified that Joby will produce, we generally agree, with one caveat; with respect to Paragraphs 2-5, we would like date information. For example, with respect to no. 2, we would like documents sufficient to show the number of units sold on a monthly basis and the gross and net sales figures on a monthly basis. With respect to no. 3, we would like the dates the various marketing, advertising and promotion costs were incurred and the months that the advertising appeared. For No. 4, we would like the dates that Joby sold the Gorillapod to the retailers and distributors. Please advise by what date you anticipate that Joby will be able to produce documents.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra R. Bernard".

Debra R. Bernard

DRB:sb

cc: Richard Darrow
Michael O. Warnecke
Brandy McMillion

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